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14	Gina Menichino, RoseMarie DeAngelo, Danielle Gutierrez, Jane Doe 100,		
15	Juliet Doherty, and Jane Doe 200		
16	UNITED STATES DISTRICT COURT		
17	DISTRICT OF NEVADA		
18	SACE HUMBUBIES CINA MENICHINO		
19	SAGE HUMPHRIES, GINA MENICHINO, ROSEMARIE DeANGELO, DANIELLE		
20	GUTIERREZ, JANE DOE 100, JULIET DOHERTY, and JANE DOE 200,	Case Number: 2:21-cv-01412-ART-EJY	
21	Plaintiffs,	[PROPOSED] PROTECTIVE ORDER	
22	vs.		
23	MITCHELL TAYLOR BUTTON and		
24	DUSTY BUTTON,		
25	Defendants.		
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[PROPOSED] PROTECTIVE ORDER Case Number: 2:21-cv-01412-ART-EJY

Upon the request of the Plaintiffs in the above-captioned matter, and pursuant to Federal Rule of Civil Procedure 26(c), the Court hereby enters the following protective order to provide a mechanism for Plaintiffs Jane Doe 100 and Jane Doe 200 ("Doe Plaintiffs") to provide their identities to defendants.

- 1. Upon entry of this protective order, the Doe Plaintiffs, through their counsel, will provide their identities to undersigned defense counsel of record.
- 2. The following persons may receive notice of the Doe Plaintiffs' identities: (a) Defendants Mitchell Taylor Button and Dusty Button; (b) counsel for defendants; (c) persons regularly in the employ of counsel for defendants who have a need to know Plaintiff's identity in the performance of their duties related to this action; (d) potential witnesses for this action, including expert witnesses, provided that such persons agree to and sign the attached undertaking (Appendix A). Counsel for defendants shall maintain copies of all signed undertakings.
- 3. Any person who learns either of the Doe Plaintiff's identities pursuant to this Protective Order shall use that information only for purposes of this litigation and shall not disclose either of the Doe Plaintiff's identities to anyone except persons identified in Paragraph 2, absent court order.
- 4. This protective order does not alter the requirements of District of Nevada Local Rule 10-5, which requires that papers filed with the court under seal be accompanied by a motion for leave to file those documents under seal. If any party wishes to use any document containing Plaintiff's identity, or other personally identifying information that would lead to the discovery of Plaintiff's identity, in a court filing or proceeding in this action, they shall either (a) redact Plaintiff's name and other personally identifying information or (b) file a motion to seal pursuant to District of Nevada Local Rule 10-5.
- 5. Each party reserves the right to seek to modify the terms of this protective order and Plaintiff's pseudonym status at any time. Before doing so, however, the counsel for the

## Case 2:21-cv-01412-ART-EJY Document 53 Filed 06/13/22 Page 3 of 4

party seeking to modify this protective order shall confer with counsel for all other parties to this action. IT SO ORDERED. Dated: June 13, 2022 

## **APPENDIX A**

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ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND				
I,, declare under penalty of perjury that I have re	ead			
in its entirety and understand the Protective Order that was issued by the United States Dist	rict			
Court for the District of Nevada on, 2022 in Humphries et. al. v. Button	et.			
al., No. 2:21-cv-01412-ART-EJY. I agree to comply with and to be bound by all the terms	s of			
this Protective Order and I understand and acknowledge that failure to so comply could expose				
me to sanctions and punishment in the nature of contempt. I solemnly promise that I will	not			
disclose in any manner any information or item that is subject to this Protective Order to	any			
person or entity except in strict compliance with the provisions of this Order. I further agree	e to			
submit to the jurisdiction of the United States District Court for the District of Nevada for	the			
purpose of enforcing the terms of this Protective Order, even if such enforcement proceedings				
occur after termination of this action.				
Date: City and State where sworn and signed: Printed name: Signature:				